

Peter J. Andrews [PA-3295]
THE HARMAN FIRM, PC
Attorneys for Plaintiffs
200 West 57th Street, Suite 900
New York, NY 10019
Tel.: (212) 425-2600
Fax: (212) 202-3926
pandrews@theharmanfirm.com

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
VERONICA ROBLED0, Individually And On Behalf Of
All Other Persons Similarly Situated,

12 Civ. 3579 (ALC)(DCF)

Plaintiffs,

NOTICE OF MOTION

-against-

No. 9 PARFUME LEASEHOLD,
LAURICE & CO. UPTOWN, INC.,
LAURICE WASHINGTON LTD.,
LAURICE & BLEECKER CORP.,
LAURICE SOUTHAMPTON, INC.,
LAURICE MADISON LTD., and
LAURICE RAHME, Individually,

Defendants.

-----X

PLEASE TAKE NOTICE THAT, upon the annexed Affidavits of Peter J. Andrews, sworn to on August 3, 2011, and Veronica Robledo, sworn to on August 2, 2011, the Memorandum of Law In Support of the Plaintiff's Motion, and upon all prior pleadings and proceedings herein, the Plaintiff will move this Court, before the Honorable Debra Freeman, United States Magistrate Judge, United States District Court for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order:

a) Directing Defendants to disclose the names and last known address of all current and former employees who worked as sales associates or customer service associates within the statutory time period;

b) Authorizing that notice be sent, pursuant to 29 U.S.C. § 216(b), to all similarly situated employees that they may opt into this action should they wish to assert claims under the Fair Labor Standards Act, 29 U.S. C. § 201 *et seq.* (Plaintiff proposes that the notice be written, in a form approved by the Court, and has attached a proposed notice as Exhibit “A” to the Affidavit of Peter J. Andrews); and

c) For such further relief as this Court may deem just and proper.

Dated: New York, New York
August 3, 2012

By: /s/
Peter J. Andrews [PA-3295]
THE HARMAN FIRM, P.C.
Attorneys for Plaintiff
200 West 57th Street, Suite 900
New York, New York 10019
(212) 425-2600
pandrews@theharmanfirm.com

TO: Dennis A. Lalli, Esq.
BOND SCHOENECK & KING
Attorneys for Defendants
330 Madison Avenue
New York, NY 10017
(646) 253-2312
dlalli@bsk.com